

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re: \$14,000.00 in U.S. Currency  
CATS No. 20-USP-001951

Case No.: 2:21-mc-50853-SJM

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**STIPULATION TO EXTEND UNITED STATES' TIME TO FILE A  
FORFEITURE COMPLAINT AND TO TOLL THE CIVIL FILING DEADLINE**

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It is hereby stipulated by and between the United States of America, by and through its undersigned attorneys, and Administrative Claimant Jymika Lewis, as follows:

1. On June 22, 2020, the U.S. Postal Service ("USPS") seized the following property: \$14,000.00 in U.S. Currency (referred to herein as the "Property").
2. The Parties acknowledge and stipulate that the USPS provided notice as required by 18 U.S.C. § 983(a)(1)(A) of the seizure and its intent to administratively forfeit the Property to all known interested parties, including to Jymika Lewis.
3. Jymika Lewis filed a claim in the administrative forfeiture proceeding with the USPS regarding the Property. No other person has filed a claim to the Property in the administrative forfeiture proceeding.
4. The USPS referred the administrative claim to the United States Attorney's Office for civil judicial forfeiture proceedings.
5. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), within 90 days after a

claim has been filed in an administrative forfeiture proceeding, the United States is required to do one of the following:

- (a) file a complaint for forfeiture against the claimed property,
- (b) return the claimed property, or
- (c) include the claimed property for forfeiture in a criminal action,

in order for the United States to take further action to effect the civil forfeiture of the claimed property in connection with the underlying offense, unless the court extends the deadline for good cause shown or by agreement of the parties. In this case, the 90-day deadline would be **June 16, 2021**.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the 90-day deadline set forth in 18 U.S.C. § 983(a)(3)(A) and (B), and to toll the deadline, in order for the parties to have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the Property.

7. Jymika Lewis knowingly, intelligently, and voluntarily gives up any rights she may have under 18 U.S.C. § 983(a)(3)(A) and (B) to require the United States to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action by **June 16, 2021**.

8. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **90 days** from **June 16, 2021** to and including

**September 14, 2021.**

9. Jymika Lewis waives all constitutional and statutory challenges related to the foregoing extension and gives up any rights she may have to seek dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. Jymika Lewis further waives and agrees to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

10. Jymika Lewis agrees that until the United States files a complaint for forfeiture against the Property and/or alleges forfeiture of the Property in a criminal action, or until **September 14, 2021**, whichever occurs first, the Property shall remain in the custody of the United States and Jymika Lewis shall not seek its return for any reason in any manner.

11. By signing below, Jymika Lewis declares that she read this Stipulation, she had the opportunity to consult with an attorney regarding its contents, she understands its terms and is aware of her rights in this matter.

12. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

Based upon the foregoing, and the record in this case, the Parties respectfully request this Court to enter the Order Extending United States' Time to File a

Forfeiture Complaint and to Toll the Civil Deadline, which will be submitted to the Court via ECF utilities.

Approved as to form and substance:

Saima S. Mohsin  
Acting United States Attorney

S/Catherine E. Morris  
Catherine E. Morris (P84371)  
Assistant United States Attorney  
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(Signature page attached)  
Jymika Lewis  
66 15<sup>th</sup> Street  
Port Huron, Michigan 48060  
(810) 689-0806  
Clslady75@yahoo.com

Dated: May 27, 2021

Dated: June 1, 2021

contents, she understands its terms and is aware of her rights in this matter.

12. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

Based upon the foregoing, and the record in this case, the Parties respectfully request this Court to enter the Order Extending United States' Time to File a Forfeiture Complaint and to Toll the Civil Deadline, which will be submitted to the Court via ECF utilities.

Approved as to form and substance:

Saima S. Mohsin  
Acting United States Attorney

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Dated: May 27, 2021

  
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Port Huron, Michigan 48060  
(810) 689-0806  
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Dated: June 01, 2021

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**ORDER EXTENDING UNITED STATES' TIME TO FILE A  
FORFEITURE COMPLAINT AND TO TOLL THE CIVIL FILING DEADLINE**

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Pursuant to 18 U.S.C. § 983(a)(1)(A), the United States of America, by and through its attorneys, and Administrative Claimant Jymika Lewis, have entered into a Stipulation to Extend United States' Time to File a Forfeiture Complaint and to Toll the Civil Filing Deadline ("Stipulation") in which they agreed to extend the 90-day deadline, set forth in 18 U.S.C. § 983(a)(3)(A) and (B), for the United States to file a civil forfeiture complaint and toll the civil filing deadline with regard to the following property:

\$14,000.00 in U.S. Currency (the "Property").

Upon consideration of the Stipulation, and pursuant to 18 U.S.C. § 983(a)(1)(A), IT IS HEREBY ORDERED that:

1. The deadline by which the United States shall be required to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **90 days** from **June 16, 2021** to and including **September 14, 2021**.

2. Jymika Lewis has given up any rights she may have under 18 U.S.C. §

983(a)(3)(A) and (B) to require the United States to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action by **June 16, 2021**

3. Jymika Lewis has waived all constitutional and statutory challenges related to the foregoing extension and has given up any rights she may have to seek dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. Jymika Lewis further waived and agreed to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

4. Until the United States files a complaint for forfeiture against the Property and/or alleges forfeiture of the Property in a criminal action, or until **September 14, 2021**, whichever occurs first, the Property shall remain in the custody of the United States and Jymika Lewis shall not seek its return for any reason in any manner.

SO ORDERED.

Dated: June 11, 2021

s/Stephen J. Murphy, III  
STEPHEN J. MURPHY, III  
United States District Court Judge